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REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed December 2, 2005. Through this response, claims 37, 40, 46, 50, 53, 56, 59-60, and 66 have been amended, and claims 43, 45, 55, and 58 have been canceled without prejudice, waiver, or disclaimer. Reconsideration and allowance of the application and pending claims 37-42, 44, 46-54, 56-57, and 59-66 are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 112, Second Paragraph

Claims 43, 45 and 60 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. In particular, the Office Action states the following:

As per claims 43 and 60 the applicant claims "...generic access instructions." It would be unclear to one of ordinary skill in the art what instructions constitute "generic access instructions."

As per claim 45, the applicant claims "...unreliable web services..." It would be unclear to one of ordinary skill in the art what instructions constitute "unreliable web services."

With regard to "generic access instructions" and "unreliable web services," although Applicants disagree that these phrases would be unclear to one skilled in the art, in the interest of removing disputed issues and expediting allowance of the claims, Applicants have canceled claims 43 and 45, and omitted the disputed phrase, "generic access instructions," from claims 60 and 61.

Thus, in view of the above explanation, it is respectfully asserted that the pending claims define embodiments of the invention in the manner required by 35

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U.S.C. § 112. Accordingly, Applicants respectfully submit that the rejections to these claims have been rendered moot.

II. Claim Rejections - 35 U.S.C. § 103(a)

A. Statement of the Rejections

The Office Action indicates that claims 37-43 and 47-66 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Gudorf et al.* ("Gudorf," U.S. Pub. No. 2002/0174230) further in view of *Linden et al.* ("Linden," U.S. Pub. No. 2002/0019763). The Office Action indicates that claims 44-46 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Gudorf* and *Linden* and further in view of *Gillespie et al.* ("Gillespie," U.S. Pub. No. 2002/0059243). Applicants respectfully traverse these rejections.

B. Discussion of the Rejection

As has been acknowledged by the Court of Appeals for the Federal Circuit, the U.S. Patent and Trademark Office ("USPTO") has the burden under section 103 to establish a *prima facie* case of obviousness by showing some objective teaching in the prior art or generally available knowledge of one of ordinary skill in the art that would lead that individual to the claimed invention. *See In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). The Manual of Patent Examining Procedure (MPEP) section 2143 discusses the requirements of a *prima facie* case for obviousness. That section provides as follows:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teaching. Second, there must be a

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reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must be found in the prior art, and not based on applicant's disclosure.

In the present case, applicants respectfully submit that a *prima facie* case for obviousness has not been established.

Independent Claim 37

Claim 37 recites (with emphasis added):

37. A system comprising:

a browser having an applications program interface (API) and a user identification (ID) coupled to the API, the user ID comprising a reference to a user profile associated with a profile store, the user profile comprising a reference to a graphics store and a composition store associated with a user, the API exposed to web content downloaded to the web browser over a network, the web content comprising one or more graphics;

a user profile server comprising the profile store, wherein the profile store comprises user specific data;

a graphics server comprising the graphics store, wherein the graphics store is configured to enable network access by the browser of the one or more graphics; and

a composition server comprising the composition store, wherein the composition store comprises one or more compositions that determine the manner in which the one or more graphics are mapped into a series of web pages,

wherein the browser is coupled over a network to the user profile server, the graphics server, and the composition server, and wherein the API is configured to make the user specific data and the one or more graphics formatted according to the one or more compositions available to a first web service, wherein the API is configured to enable the first web service to perform optical character recognition on the one or more graphics in response to a request by the first web service for information pertaining to the user profile.

Applicants respectfully submit that *Gudorf* in view of *Linden* fails to disclose, teach, or suggest at least the emphasized claim features. In addition, the Office Action asserts the following with regard to the API deficiency in *Gudorf*:

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Gudorf fails to specifically disclose use of applications program interface (API). However, Linden discloses use of an API (paragraph 0119: Here, a plug-in is an API).

Applicants respectfully disagree that the plug-in is an API. According to the web-site reference, *Wikipedia*, the browser plug-in is described as follows:

The Alexa Toolbar, an Alexa Internet product, is a Browser Helper Object (BHO) often used to measure website statistics. It includes a popup blocker, a search engine, a link to Amazon.com, a link to Alexa, information about the current Alexa ranking of the website that you're visiting, and links relevant to the site you're browsing. The toolbar is only compatible with Internet Explorer on Microsoft Windows. By early 2005 there had been over 10 million downloads of the toolbar, according to Alexa.

There are some privacy fears with this toolbar, as the toolbar sends browsing habits back to Alexa. It is the information that is sent back that provides Alexa with its statistics on website traffic.

There is nothing to indicate that this browser plug-in is an API, and thus Applicants respectfully request that the rejection to independent claim 37 be withdrawn.

Additionally, because the addition of *Gillespie* does not remedy the above-mentioned deficiencies, Applicants respectfully submit that claims 44-46 are allowable over *Gudorf* and *Linden* and further in view of *Gillespie*.

Because independent claim 37 is allowable over *Gudorf* in view of *Linden* and further in view of *Gillespie*, dependent claims 38-42, 44, and 46-54 are allowable as a matter of law for at least the reason that the dependent claims 38-42, 44, and 46-54 contain all elements of their respective base claim. See, e.g., *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

Independent Claim 56

Claim 56 recites (with emphasis added):

56. A method for providing user-specific web pages, comprising:
receiving web content comprising one or more graphics;
responsive to activation by the web content:

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storing the one or more graphics in a network accessible graphics store;

creating one or more compositions corresponding to the manner in which the one or more graphics are mapped into web pages and storing the same in a network accessible composition store;

in response to a web service request for information, enabling access of a user profile by the web service, the user profile associated with a network accessible profile store, the user profile comprising a reference to the graphics store, the composition store, and the one or more compositions; and

enabling optical character recognition by the web service of the one or more graphics to provide the requested information for use in presentation in the web pages with data specific to a user corresponding to the user profile and with the one or more graphics formatted based on the one or more compositions.

Applicants respectfully submit that *Gudorf* in view of *Linden* fails to disclose, teach, or suggest at least the emphasized claim features. Accordingly, Applicants respectfully submit that independent claim 56 is allowable over the art of record.

Because independent claim 56 is allowable over *Gudorf* in view of *Linden*, dependent claims 57 and 59-65 are allowable as a matter of law.

Independent Claim 66

Claim 66 recites (with emphasis added):

66. A system comprising:
- means for receiving web content comprising one or more graphics; responsive to activation by the web content:
 - means for storing the one or more graphics in a network accessible graphics store and creating one or more compositions corresponding to the manner in which the one or more graphics are mapped into web pages and storing the same in a network accessible composition store;
 - in response to a web service request for information, means for enabling access of a user profile by the web service, the user profile associated with a network accessible profile store, the user profile comprising a reference to the graphics store, the composition store, and the one or more compositions; and
 - means for enabling optical character recognition by the web service of the one or more graphics to provide the requested information for use in presentation in the web pages with data specific to a user corresponding to the user profile and with the one or more graphics formatted based on the one or more compositions.

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Applicants respectfully submit that *Gudorf* in view of *Linden* fails to disclose, teach, or suggest at least the emphasized claim features. Accordingly, Applicants respectfully submit that independent claim 66 is allowable over the art of record.

In summary, it is Applicants' position that a *prima facie* for obviousness has not been made against Applicants' claims. Therefore, it is respectfully submitted that each of these claims is patentable over *Gudorf* in view of *Linden* and further in view of *Gillespie*, and that the rejection of these claims should be withdrawn.

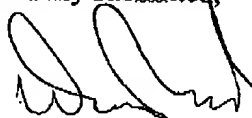
III. Canceled Claims

As identified above, claims 43, 45, 55, and 58 have been canceled from the application through this Response without prejudice, waiver, or disclaimer. Applicants reserve the right to present these canceled claims, or variants thereof, in continuing applications to be filed subsequently.

CONCLUSION

Applicants respectfully submit that Applicants' pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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